

U.S. Patent Application 09/877,744

Docket No.: V9661.0019

**REMARKS**

Claims 1 to 19 are in the case. The Examiner is respectfully requested to reconsider the subject application in view of the following remarks.

Claims 1 - 7 and 9 -19 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,875,190 to Law, for reasons set forth on pages 2 to 4 of the Office action. This rejection is respectfully traversed.

Independent claim 1 recites a method for assigning an address to a node in a network having an arbitrary topology. The claimed invention comprises providing a first address to a first node such that the first address includes a description of a path to the first node. A plurality of output ports in the network and bits in the first address of a first node are mapped, so that a packet which is directed to the first address at a second node is forwarded via an output port of the second node, in response to a specified bit in the first address having a specified value. The claimed invention is capable of routing between any pair of nodes as desired. The path between nodes can be chosen arbitrarily and more than one path can be defined.

Law does not disclose the claimed invention. For example, Law does not disclose "providing a first address to a first node such that the first address includes a description of a path to the first node" as recited in claim 1. In contrast, the cited portions of Law teach that the packets arriving at the input ports of a distribution network comprise address field indicating which output ports of the distribution network the packet is destined for. Since only a unique path is available between a pair of input port and output port, the address provided to an input port indicates a different port to which the packet is to be distributed, rather than a path to the output port to which the address is provided as is recited in the claimed invention.

Moreover, Law does not disclose "establishing a mapping between a plurality of output ports in the network and bits in the first address such that a packet, directed to the first address, at a second node in the network is forwarded via an output port on the second node in the network, in response to a specified bit in the first address having a specified value" as recited in claim 1. Conversely, the cited portions of Law teach distributing a packet from an input port of an input node to an output port of an output node in a distribution network. As is shown in Fig. 4 of Law, the cell 34 can only be routed from the input node 26(0,0) to one of the outputs 36<sub>1</sub> to 36<sub>8</sub>,

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according to the content of extra cell header 32. *Law* does not teach nor is it possible for *Law* to route a cell from, for example, output node 26(2,0) to input node 26(0,0).


In view of the above, applicants respectfully submit that *Law* does not teach or suggest each and every feature of independent claim 1. Therefore, the present invention recited in claim 1 patentably distinguishes over *Law*. Independent claim 1 is thus allowable. Claims 2 - 7 depend from claim 1 and thus are believed to be allowable for at least the same reasons that claim 1 is allowable. Moreover, claims 9 - 19, which were rejected on similar grounds as claims 1 - 7 were, are also believed allowable for at least the same reasons presented above.

Applicants have shown that claims 1 to 19 are patentable over the cited art and hereby respectfully request that the rejection of the pending claims be withdrawn. Each of the claims 1 to 19 in this application is believed to be in immediate condition for allowance and such action is earnestly solicited. In case the Examiner does not agree with all of applicants' remarks presented above, the Examiner is respectfully requested to telephone the undersigned to discuss the remaining issues to expedite the ultimate allowance of this subject application.

No fee is believed to be due for this Response. Should any fees be required, please charge such fees to Deposit Account No. 50-2215.

Respectfully submitted,

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